EXHIBIT B

Case	5:22-cv-00949-KK-SHK D	ocument 95-3 #:946	Filed 01/13/25	Page 2 of 9 Page ID		
1 2 3 4 5 6 7	#:946 Shannon L. Gustafson (SBN 228856) sgustafson@lynberg.com Amy R. Margolies (SBN 283471) amargolies@lynberg.com Anita K. Clarke (SBN 321015) aclarke@lynberg.com LYNBERG & WATKINS A Professional Corporation 1100 W. Town & Country Road, Suite #1450 Orange, California 92868 (714) 937-1010 Telephone (714) 937-1003 Facsimile					
8	Attorneys for Defendants, COUNTY OF SAN BERNARDINO, ROBERT VACCARI and JAKE ADAMS					
9	UNITED STATES DISTRICT COURT					
10	CENTRAL DISTRICT OF CALIFORNIA					
11	JONATHAN WAYNE BOTTE	OTTEN, SR.; N:	CASE NO. 5:2	23-cv-00257-KK-(SHKx)		
12	ANNABELLE BOTTEN; minor by and through his	and J.B., a guardian	Assigned for A	Ill Purposes to:		
13	JONATHAN WAYNE B	OTTEN, SR.,	Hon. Kenly Ki	ya Kato– Courtroom #3		
14	Plainti	ffs,	NOTICE OF ANABELLE	DEPOSITION OF BOTTEN		
15 16	VS.	A COLDITY		ember 18, 2024		
17	STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; ISAIAH KEE; MICHAEL BLACWOOD;		TIME: 1:00 p.m. VIA: ZOOM			
18	BERNARDO RUBALCA ROBERT VACCARI; JA	.VA;	Complaint filed: February 16, 2023			
19	and DOES 1-10 inclusive	<i>y</i> ,	Complaint	a. 1 cornary 10, 2025		
20	Defend	dants.				
21						
22						
23	PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil					
24		Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert				
25	Vaccari and Jake Adams in the above-captioned matter will take the oral deposition					
26	of ANABELLE BOTTEN. This deposition is to take place on November 18, 2024					
27	at 1:00 p.m. via video conference (ZOOM link attached), before a Certified					
28						

Shorthand Reporter authorized to administer oaths in the State of California. 1 2 NOTICE IS FURTHER GIVEN that we reserve the right to conduct this deposition utilizing a secure web-based deposition service or telephonically only to 3 provide remote access for those parties wishing to participate in the deposition via 4 5 the internet and/or the telephone. PLEASE TAKE FURTHER NOTICE that the court reporter may also be 6 7 remote via one of the options above for the purposes of reporting the proceeding and 8 may or may not be in the presence of the deponent. 9 PLEASE TAKE FURTHER NOTICE that we also reserve the right to utilize instant visual display technology such that the court reporter's writing of the 10 proceeding or pertinent exhibits will be displayed simultaneous to their writing of 11 the same on one's laptop, iPad, tablet, or other type of display device 12 13 connected to the court reporter. 14 PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of <u>Civil Procedure</u> Rule 30, we reserve the right to record the testimony of this 15 16 deponent by sound and visual videotape technology for the purpose of using it as admissible evidence at a later proceeding, including trial. 17 If the deponent requires an interpreter, it is requested that you advise this 18 19 office at least five (5) days prior to the deposition of the language and/or dialect. 20 DATED: October 18, 2024 LYNBERG & WATKINS A Professional Corporation 21 22 23 /s/ Shannon L. Gustafson By: Shannon L. Gustafson 24 Amy R. Margolies Anita K. Clarke 25 Attorneys for Defendants, COUNTY OF SAN BÉRNARDINO, RÓBERT **26** ACCARI and JAKE ADAMS 27

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On October 18, 2024, I served the foregoing document(s) described as **NOTICE OF DEPOSITION OF ANABELLE BOTTEN** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Refer to Service List Below

BY E-MAIL: I caused all of the pages of the above-entitled document to		
be sent to the recipient(s) noted via email at the respective email		
address(es) indicated above.		

- BY FEDERAL EXPRESS/OVERNIGHT MAIL: I caused the above-described document to be served on the interested parties noted as follows by Federal Express/Overnight Mail.
- BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

BY ELECTRONIC TRANSFER via electronic filing service provider and pursuant to *California Rules of Court*, Rule 2.251, sent by e-Service through e-Filing Portal at the time the documents were electronically filed. The service was made on the email addresses listed with the court.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on October 18, 2024, at Orange, California.

/s/ Gloria Pence

Gloria Pence

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Hang D. Le
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Diana Esquivel Deputy Attorney

Attorney for Plaintiffs, Jonathan Wayne Botten, Sr.; Tanja Dudek-Botten; Annabelle Botten; Jonathan Wayne Botten, Jr. a minor by and through his Guardian ad Litem Jonathan Wayne Botten, Sr.

Diana Esquivel, Deputy Attorney General 1300 I Street, Suite 125 Sacramento, CA 94222-2350 Telephone: (916) 210-7320 Email: <u>Diana.Esquivel@doj.ca.gov</u>

Attorneys for Defendant, Michael Blackwood, Bernardo Rubalcava, and State of California

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Case	5:22-cv-00949-KK-SHK	Document 95-3 #:950	Filed 01/13/25	Page 6 of 9	Page ID	
1 2 3 4 5 6 7 8	Shannon L. Gustafson (sgustafson@lynberg.co Amy R. Margolies (SB) amargolies@lynberg.co Anita K. Clarke (SBN 3 aclarke@lynberg.com LYNBERG & WATK A Professional Corpora 1100 W. Town & Coun Orange, California 9286 (714) 937-1010 Telepho (714) 937-1003 Facsim Attorneys for Defendan ROBERT VACCARI a	m N 283471) om 321015) INS tion try Road, Suite #1 58 one ile		DINO,		
9	UNITED STATES DISTRICT COURT					
10	CENTRAL DISTRICT OF CALIFORNIA					
11	JONATHAN WAYNE TANJA DUDEK-BOT	BOTTEN, SR.;	CASE NO. 5:2	23-cv-00257-	·KK-(SHKx)	
12 13	ANNABELLE BOTTE minor by and through h JONATHAN WAYNE	N; and J.B., a is guardian	Assigned for A Hon. Kenly Ki	Ill Purposes t ya Kato– Co	to: urtroom #3	
14 15		ntiffs,	SECOND AND DEPOSITION			
16	VS.	MA. COUNTY	BOTTEN Dagge	l 16 202	4	
17	STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; ISAIAH KEE; MICHAEL BLACWOOD;		DATE: December 16, 2024 TIME: 2:00 p.m.			
18	BERNARDO RUBALO ROBERT VACCARI;	CAVA;	VIA: ZOÓM			
19	and DOES 1-10 inclusion	ive,	Complaint file	d: February	16, 2023	
20	Defe	endants.				
21			_			
22					2	
23	PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil					
24		Procedure Rule 30, counsel for Defendants County of San Bernardino, Robert				
25	Vaccari and Jake Adams in the above-captioned matter will take the oral deposition of ANAPELLE POTTEN. This deposition is to take place on December 16, 2024					
26	of ANABELLE BOTTEN. This deposition is to take place on December 16, 2024 at 2:00 p.m. via video conference before a Certified Shorthand Reporter authorized					
27	at 2.00 p.m. via viaco		a Columbia	шши кероп	51 uuu101120u	
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to administer oaths in the State of California.

NOTICE IS FURTHER GIVEN that we reserve the right to conduct this deposition utilizing a secure web-based deposition service or telephonically only to provide remote access for those parties wishing to participate in the deposition via the internet and/or the telephone.

PLEASE TAKE FURTHER NOTICE that the court reporter may also be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent.

PLEASE TAKE FURTHER NOTICE that we also reserve the right to utilize instant visual display technology such that the court reporter's writing of the proceeding or pertinent exhibits will be displayed simultaneous to their writing of

the same on one's laptop, iPad, tablet, or other type of display device connected to the court reporter.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of <u>Civil Procedure</u> Rule 30, we reserve the right to record the testimony of this deponent by sound and visual videotape technology for the purpose of using it as admissible evidence at a later proceeding, including trial.

If the deponent requires an interpreter, it is requested that you advise this office at least five (5) days prior to the deposition of the language and/or dialect.

DATED: December 10, 2024 LYNBERG & WATKINS A Professional Corporation

> /s/ Shannon L. Gustafson By: Shannon L. Gustafson

Amy R. Margolies Anita K. Clarke

Attorneys for Defendants, COUNTY OF SAN BÉRNARDINO, RÓBERT

ACCARI and JAKE ADAMS

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On December 10, 2024, I served the foregoing document(s) described as AMENDED NOTICE OF DEPOSITION OF ANABELLE BOTTEN on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Refer to Service List Below

\boxtimes	BY E-MAIL: I caused all of the pages of the above-entitled documen			
	be sent to the recipient(s) noted via email at the respective email			
	address(es) indicated above.			
	RV FEDERAL EXPRESS/OVERNIGHT MAIL: I caused the above-			

described document to be served on the interested parties noted as follows by Federal Express/Overnight Mail.

BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.

BY ELECTRONIC TRANSFER via electronic filing service provider and pursuant to California Rules of Court, Rule 2.251, sent by e-Service through e-Filing Portal at the time the documents were electronically filed. The service was made on the email addresses listed with the court.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on December 10, 2024, at Orange, California.

/s/ Gloria Pence Gloria Pence

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SERVICE LIST

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7	Diana Esquivel, Deputy Attorney General
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9	Email: <u>Diana.Esquivel@doj.ca.gov</u>
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Attorney for Plaintiffs, Jonathan Wayne Botten, Sr.; Tanja Dudek-Botten; Annabelle Botten; Jonathan Wayne Botten, Jr. a minor by and through his Guardian ad Litem Jonathan Wayne Botten, Sr.

Attorneys for Defendant, Michael Blackwood, Bernardo Rubalcava, and State of California